

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRIS BASNETT, Individually and On Behalf of All Others Similarly Situated,)	CASE NO. 1:13-cv-00214-HB ECF Case
Plaintiff,)	
v.)	<u>CLASS ACTION</u>
LONGWEI PETROLEUM INVESTMENT HOLDING LIMITED, CAI YOUNGJUN, JAMES CRANE, and MICHAEL TOUPS,)	
Defendants.)	

JUNE MA, Individually and On Behalf of All Others Similarly Situated,)	CASE NO. 1:13-cv-00229-JPO ECF Case
Plaintiff,)	
v.)	
LONGWEI PETROLEUM INVESTMENT HOLDING LIMITED, YONGJUN CAI, JAMES CRANE, and MICHAEL TOUPS,)	
Defendants.)	

[Caption continues on next page]

	x	
CHARLIE MUNIZ Individually and On Behalf of All Others Similarly Situated,)	CASE NO. 1:13-cv-00278-HB
)	ECF Case
Plaintiff,)	
)	
v.)	
)	
LONGWEI PETROLEUM INVESTMENT)	
HOLDING LIMITED, YONGJUN CAI,)	
MICHAEL TOUPS, and JAMES CRANE,)	
)	
Defendants.	x	

	X	
PAUL HOWARD, On Behalf of Himself and All Others Similarly Situated,)	CASE NO. 1:13-cv-00422-HB
)	ECF Case
)	
Plaintiff,)	
)	
v.)	
)	
LONGWEI PETROLEUM INVESTMENT)	
HOLDING LIMITED, CAI YONJUN,)	
MICHAEL TOUPS, and JAMES CRANE)	
)	
Defendants.	X	

**KHALED MOUSLY AND CATHERINE DANDY'S
RESPONSE TO COMPETING MOTIONS FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**

Khaled Mously and Catherine Dandy (“Movant”) respectfully submit this response to the competing motions filed for appointment as lead plaintiff in the above-captioned actions. Numerous parties have filed for appointment as lead plaintiff, and those motions are currently pending before this Court. Having reviewed the competing motions, it does not appear that Movant possess the “largest financial interest in the relief sought by the class” as required by the Private Litigation Securities Reform Act of 1995 (“PSLRA”). 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(bb). Therefore, Movant withdraws their motion for lead plaintiff. However,

should the Court find that the movants who currently appear to posses a larger financial interests are not willing or able to satisfy any of the PSLRA's requirements for appointment as lead plaintiff for any reason, Movant stands ready, willing, and able serve as lead plaintiff if called upon by the Court. This response shall have no effect on Khaled Mously or Catherine Dandy's rights as a member of the proposed class, and Movant expressly reserves any and all rights to share in any recovery in this action.

Dated: March 22, 2013

Respectfully submitted,

s/ Andrei V. Rado

Andrei V. Rado
MILBERG LLP
Johnathan P. Seredynski
One Pennsylvania Plaza, 49th Floor
New York, New York 10119
Telephone: (212) 594-5300
Facsimile: (212) 868-1229
E-mail: arado@milberg.com
jseredynski@milberg.com

Counsel For Khaled Mously and Catherine Dandy